

# BALLON STOLL BADER & NADLER P.C.

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7 July 2020

## VIA ECF

Honorable Colleen McMahon, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York NY 10007

**Re: Dietrich v. City of New York, et al.  
Civil Action No. 18-cv-07544 (CM)**

Dear Judge McMahon:

We represent the Plaintiff, Keith Dietrich, in the above-referenced action. Plaintiff respectfully requests, with the consent of defense counsel, that the date for the filing of the Joint Pretrial Order be adjourned from July 8, 2020 to August 21, 2020.

The above request is made for the following reasons: The undersigned is presently lead counsel on this case and has had, and continues to have health issues thereby limiting his availability. Furthermore, due to the COVID-19 pandemic, our firm has had to furlough attorneys, including the former lead counsel on this case. We have operated mostly remotely, thereby limiting attorneys' and staff's access to the office's paper files. If this request is granted, during the extended period of time, the parties intend to prepare their respective portions of the Joint Pretrial Order, and meet and confer by phone or videoconference. This is the third request for an extension of time regarding the submission of the Joint Pretrial Order. Thank you for your consideration of this matter.

Respectfully submitted,

MARSHALL B. BELLOVIN (MB5508)  
Member of the Firm  
Counsel for Plaintiff

cc:

Danielle Dandridge, Esq. (via ECF)  
Dominique Saint-Fort, Esq. (via ECF)